

EXHIBIT A

W.K. Trial Transcript June 24, 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K. et al.,)
)
Plaintiffs,)
v.) CIVIL ACTION
) FILE NO. 1:20-CV-05263-VMC
RED ROOF INNS, INC. et al.,)
)
Defendants.) JURY TRIAL
) VOLUME 9 - A.M.

BEFORE THE HONORABLE VICTORIA M. CALVERT

TRANSCRIPT OF PROCEEDINGS

JUNE 24, 2024

*Proceedings recorded by mechanical stenography
and computer-aided transcript produced by*

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1 it, where it's at.

2 THE COURT: All right. Ms. Mykkeltvedt, do you want
3 to lay more of a foundation?

4 MS. MYKKELTVEDT: Sure. There is no objection to the
5 authenticity of these police reports, your Honor. There's no
6 objection to the authenticity or the foundation of the police
7 reports.

8 THE COURT: Are you objecting to him testifying about
9 it?

10 MR. KREBS: I'm objecting to the foundation. She
11 hasn't laid the foundation to actually use the exhibit with
12 him and, also, the hearsay in the document. I don't know what
13 she's going to use with respect to the document, but there's
14 been no foundation laid for it.

15 MS. MYKKELTVEDT: He just described that he was
16 involved in multiple arrests at the Red Roof Inn in Buckhead.
17 It's during the time period when he was on the MATCH Task
18 Force.

19 THE COURT: Okay. Well, those are the things to
20 ask --

21 MS. MYKKELTVEDT: Right. And there's no -- we've
22 redacted any of the hearsay out of it.

23 THE COURT: So is he going to say that this is
24 something he was involved with?

25 MS. MYKKELTVEDT: No, he's not.

1 MR. KREBS: Right --

2 THE COURT: So.

3 MS. MYKKELTVEDT: But it's admissible on its own to
4 demonstrate what was happening at the Red Roof Inn at the time
5 Special Agent Fonseca was involved in the task force, and it
6 reflects the same kind of conduct that he's just described.

7 THE COURT: I'm going to sustain the objection, which
8 is just to this exhibit. We can talk about it later, but for
9 right now I'll sustain it.

10 BY MS. MYKKELTVEDT:

11 Q Okay. Did the Buckhead Red Roof Inn have a reputation
12 among law enforcement at the time?

13 A With myself and our task force it was -- it did have the
14 reputation of being a place where prostitution was prevalent,
15 yes.

16 Q Did you ever, as part of your surveillance of the Buckhead
17 Red Roof Inn, interact with the managers who worked there?

18 A On a routine basis we would speak to the management and to
19 staff at the hotels, yes.

20 Q That was part of your general practice?

21 A It is -- it was.

22 Q And did you sometimes offer training to hotels?

23 A We did.

24 Q Did the managers of the Buckhead Red Roof Inn ever take
25 you up on your offer to provide them training?

1 A They did not.

2 Q Did the managers of the Buckhead Red Roof Inn cooperate
3 with law enforcement?

4 A To the extent that they never -- I can say I never had a
5 positive interaction with the Red Roof Inn. I didn't get the
6 warm and fuzzies that told us we don't have to go through
7 their parking lot anymore to search for incidents of
8 prostitution.

9 Q Were there other hotels that did cooperate with the MATCH
10 task force?

11 A Oh, yes, plenty.

12 Q Special Agent Fonseca, in your work -- as part of your
13 work with the MATCH Task Force, did you ever have occasion to
14 visit the Red Roof Inn on Windy Hill Road at 2200 Corporate
15 Plaza?

16 A I did.

17 Q And that's in Smyrna?

18 A It is.

19 Q I'm going to show you Exhibit 640, which has been
20 admitted, your Honor.

21 Special Agent Fonseca, can you describe for us the
22 Smyrna property?

23 A Yes. That property is located behind kind of a mall
24 complex with -- I believe that's a Target or a Wal-Mart that's
25 right behind it. There's a Target. At the top corner, at